

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

MARQUIS PROCAP SYSTEM, LLC,

Plaintiff,

v.

Case No.

NOVOZYMES NORTH AMERICA, INC.,

ORAL ARGUMENT REQUESTED

Defendants.

**MARQUIS'S MOTION TO COMPEL THIRD-PARTY WITNESSES  
GREEN PLAINS, INC., TODD BECKER, AND WALTER CRONIN TO COMPLY  
WITH DEPOSITION SUBPOENAS, AND FOR  
GREEN PLAINS, INC. TO COMPLY WITH DOCUMENT SUBPOENA**

Pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure, Plaintiff Marquis ProCap System, LLC (“Marquis”) moves this Court to compel third-party witnesses Green Plains Inc.’s (“Green Plains”), Todd Becker (“Becker”), and Walter Cronin (“Cronin”) to comply with deposition subpoenas and for Green Plains to comply with a document subpoena. In support of this motion, Plaintiff relies upon the attached memorandum of law.

**WHEREFORE**, Plaintiff respectfully requests an order compelling Green Plains’ Rule 30(b)(6) witness, Todd Becker, and Walter Cronin, to appear for remote depositions, compel Green Plains to respond in full to Marquis’s document subpoena, and grant Marquis such other and further relief as this Court deems equitable and just.

\* \* \* \*

Dated: October 1, 2020

Respectfully submitted,

/s/ John C. Gekas

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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that the foregoing document was filed with the Court's CM/ECF system and e-mailed to the following counsel of record:

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